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Weston Solutions, Inc.  
6779 Engle Road, Suites I & J  
Middleburg Heights, Ohio 44130

February 25, 2008

Mr. Joseph Fredle  
On-Scene Coordinator  
United States Environmental Protection Agency Region V  
25089 Center Ridge Road  
Westlake, Ohio 44145

**Re: Interim Removal Report for the Trinity Site Removal Action  
Cleveland, Cuyahoga County, Ohio  
Technical Direction Document: S05-0711-014  
Document Control Number: 337-2A-ABOD  
Work Order No: 20405.012.003.0337.00**

Dear Mr. Fredle:

The United States Environmental Protection Agency (U.S. EPA) tasked the Weston Solutions, Inc., (WESTON®) Superfund Technical Assessment and Response Team (START) under Technical Direction Document (TDD) S05-0711-014 to support a removal action at the Trinity Site, 9203 Detroit Road, Cleveland, Cuyahoga County, Ohio (Site). Elevated concentrations of polychlorinated biphenyls (PCBs) discovered within the on-site soils and remnant concrete of the former manufacturing facility pose a threat to human health and the environment.

This document provides an interim progress report of the U.S. EPA removal and disposal of PCB-containing wastes, and includes results of confirmation soil sampling performed at the Site between December 3, 2007, and January 8, 2008. U.S. EPA has temporarily postponed additional removal activities at the Site pending an investigation of former owner-operators as potentially responsible parties. A final report of the removal action will be provided to following the completion of the field activities and validation of all confirmation sampling analytical results.

WESTON START recently completed a site assessment at the Site under TDD S05-0705-006, from May 2007 through December 2007. Site assessment activities performed by WESTON START included sampling and laboratory analysis of remnant concrete slab material, crushed concrete debris, sewer sediment, site soil, and Bailey Terrace Apartments' residential property soil. The remnant concrete slabs had been the foundation of a former aluminum foundry and die-casting plant. The analytical results from these samples, and additional samples collected during a Phase I investigation by City contractor HzW Environmental Consultants, LLC, have established that the concrete and soil matrices contain elevated levels of PCBs, primarily Aroclor 1248. On-site concentrations of Aroclor 1248 reached 10,700 milligrams per kilogram (mg/kg). A more thorough discussion of the analytical results from the site assessment has been provided to U.S. EPA in a site assessment report dated January 29, 2008 (document control number [DCN] 199-2A-ABHM).



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## **DELINEATION OF THE EXCAVATION AREAS**

Based on the analytical results from the City's Phase I environmental site assessment and the WESTON START site assessment, U.S. EPA initiated a fund-led removal action at the Site on November 15, 2007. The scope of this removal action was limited to the removal and disposal of the highest-concentration PCB-contaminated soil, located north of the West Pad, within 10 feet of the western property boundary adjacent to the Bailey Terrace Apartments, and within 3 feet of the fence line on Bailey Terrace property.

U.S. EPA Emergency and Rapid Response Services (ERRS) contractor Inland Waters of Ohio and WESTON START were mobilized to the Site on December 3, 2007, to begin soil and concrete removal. Analytical results provided to U.S. EPA in the WESTON START site assessment report were used to delineate two on-site areas for excavation of soil and concrete that contained PCB concentrations greater than 16 mg/kg, the Ohio EPA Voluntary Action Program (VAP) Generic Direct-Contact Soil Standard for commercial and industrial property. The PCB Aroclor 1248 contour data used by WESTON START field personnel to delineate the excavation areas is included in Figure A-1. White spray paint was used to mark the 16 mg/kg contour line onto the ground surface north of the West Pad, to guide the excavator operator.

In order to remove PCB-contaminated concrete and soil situated adjacent to the Bailey Terrace Apartments property, an area 10 feet wide (east-west) and 175 feet long (north-south) along the western boundary of the West Pad was marked for excavation. An area 20 feet wide (east-west) and 50 feet long (north-south) of the northwest gravel driveway was also marked for removal. The northwest gravel driveway was composed of a mixture of PCB-contaminated crushed concrete debris and soil from the demolition of the former facility, posing a risk of off-site cross-contamination. Photos 3, 4, and 5 of the photo log in Attachment B show the excavation areas prior to removal. WESTON START collected coordinates of the removal areas with a Trimble global positioning system (GPS) unit. The excavation areas are depicted in Figure A-2 of Attachment A.

## **ERRS REMOVAL OPERATIONS**

### *Removal of Crushed Concrete from the Northwest Gravel Driveway*

ERRS mobilized one combination front-end loader and excavator to the Site on December 3, 2007. ERRS utilized the northeast entrance to the Site during the removal operations, avoiding the PCB-contaminated northwest entrance. ERRS began removing PCB-contaminated crushed concrete from the northwest gravel driveway by scraping six-to-eight inches of surface material southward (into the Site), using the front-end loader bucket (Photo 1, Attachment B). Crushed concrete removed from the driveway was temporarily staged at the northern edge of the West Pad, where PCB concentrations exceeded 50 mg/kg. On December 4, 2007, fresh crushed limestone was delivered to the Site, backfilled on the northwest gravel driveway, and compacted (Photo 2, Attachment B).



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#### *Removal of Soil North of the West Pad*

On December 4, 2007, ERRS mobilized an excavator to the Site for the removal of larger concrete debris and excavation work. Removal operations north of the West Pad began with excavation of a trench along the northern boundary of the West Pad, 5 feet wide (north-south), 150 feet long (east-west), and 2.5 to 3.5 feet deep (Photo 6, Attachment B). This portion was excavated to 3.5 feet below ground surface (bgs) due to the known high concentrations of Aroclor 1248 in the concrete of the West Pad and adjacent soil. The excavation work along the northern edge of the West Pad exposed a cross-sectional view of the pink-stained concrete slab (Photos 7 and 8, Attachment B) discussed in the WESTON START site assessment report dated January 29, 2008 (DCN 199-2A-ABHM), and the PCB Source Investigation letter report dated January 25, 2008 (DCN 337-2A-ABMY). Soil removed from this excavation was placed directly into dump trailers with plastic liners, while concrete waste was temporarily staged at the south end of the excavation (Photo 9, Attachment B). Excavation work north of the West Pad continued on December 5, 2007, by utilizing the front-end loader to scrape six-to-eight inches of surface soil where PCB concentrations exceeded 16 mg/kg. ERRS completed soil removal within the delineated area north of the West Pad on December 7, 2007 (Photo 10, Attachment B).

#### *Removal of Soil and Concrete Along the Western Property Boundary*

On December 10, 2007, ERRS began excavation and removal of soil and buried concrete debris along the western property boundary. ERRS used chainsaws to remove several small trees and lower branches from larger trees to allow the excavator bucket to reach the fence line without obstructions (Photo 11, Attachment B). ERRS excavated an area 10 feet wide (east-west), 175 feet long (north-south) and 6 to 8 inches in depth along the western boundary of the West Pad. Additionally, the chain-link fence along the property boundary was temporarily disassembled at the base and pushed aside, allowing the excavator to reach one-to-two feet onto Bailey Terrace Apartments property. Soil and concrete removed from the excavation were placed directly into dump trailers for transport to the disposal facilities. ERRS completed removal operations along the western property boundary on December 11, 2007. A fresh gravel berm was placed along the fence line. Clean soil was backfilled into the remainder of the excavation (Photos 12 and 13, Attachment B).

Thirty-eight trailer loads of PCB-contaminated concrete and soil were transported from the Site to two disposal facilities during the removal operations between December 3 and December 11, 2007. Prior to departing the Site, tractor trailer tires were rinsed with a steam pressure washer mobilized by ERRS (Photo 14, Attachment B). The dump trailer loads were covered with a plastic liner while in transit to the disposal facility. Manifest copies for the transportation of the waste soil were signed and retained by the U.S. EPA On-Scene Coordinator. A summary of the waste streams generated during this portion of site work is listed in Table C-1 of Attachment C.

### **CONFIRMATION SOIL SAMPLING: METHODOLOGY**

WESTON START returned to the Site on January 8, 2008, to collect surface soil confirmation samples from the areas excavated December 3 through December 11, 2007. The confirmation sampling



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locations are shown in Figure A-3 of Attachment A. Twenty-one surface soil samples, including one duplicate, were collected from the areas excavated in December, 2007. Seventeen sampling locations were north of the West Pad and within the northwest drive. One of the sampling locations was along the Site's western property boundary. The additional two sampling locations were located on Bailey Terrace Apartments property, within 3 feet of the Site boundary. A Trimble GPS unit was used to collect coordinates at each sampling location.

Surface soil (0 to 2 inches bgs) was collected into a four-ounce jar at each sampling location shown in Figure A-3. Each sample jar was designated with a unique sample name and clearly labeled. The sample nomenclature continued sequentially from the previous round of sampling performed on November 21, 2007; therefore, the first sample collected on January 8, 2008, was labeled with sample name WSE-1-08-37. A duplicate sample labeled WSE-1-08-57 was also collected at the same location as WSE-1-08-39. Individually wrapped, disposable, high-density polyethylene sampling trowels were used to collect surface soil. New nitrile gloves were donned prior to the collection of each soil sample. After each sample was collected, used gloves and trowels were discarded into a plastic trash bag that remained on-site for later disposal. The confirmation soil samples collected on January 8, 2008, were placed on ice in a cooler and delivered under chain of custody to the EA Group laboratory in Mentor, Ohio, for PCB Aroclor analysis by Method SW-846-8081.

## **CONFIRMATION SOIL SAMPLING: ANALYTICAL RESULTS**

EA Group provided the confirmation sampling analytical results to a WESTON START chemist for validation on January 24, 2008. The validated analytical results are shown in Figure A-3 in Attachment A, and Table C-2 in Attachment C. Due to high concentrations of PCBs that exceeded the normal range of the laboratory equipment, the technician performed dilutions on some of the extracted samples. Therefore, some of the reported analytical results have elevated method detection limits due to the applied dilution factor, and the results were standardized by the laboratory to account for the dilution.

Aroclor 1248 was the only PCB congener reported in the analytical results. Aroclor 1248 concentrations ranged from non-detection (0.12 mg/kg reporting limit) in samples WSE-1-08-44, WSE-1-08-55 and WSE-1-08-56, to 8,500 mg/kg in sample WSE-1-08-37. Twelve of the 21 confirmation samples exhibited concentrations of Aroclor 1248 greater than 16 mg/kg, the Ohio EPA VAP Generic Direct-Contact Soil Standard for commercial and industrial property. As with previous analytical results obtained during the site assessment, PCB Aroclor 1248 concentrations in soil were highest near the West Pad, and decreased radically within 50 feet of the West Pad's northern edge.

The concentration of Aroclor 1248 in sample WSE-1-08-54, collected from the western property boundary, was reported at 8.2 mg/kg. Both of the confirmation samples collected from the Bailey Terrace Apartments property (WSE-1-08-55 and WSE-1-08-56) were reported as non-detections. The PCB concentrations in all three of these samples were less than 16 mg/kg, the targeted cleanup criteria.





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## **SUMMARY OF KEY ISSUES AND ANTICIPATED REMOVAL ACTIVITIES**

The analytical results from the confirmation sampling event on January 8, 2008, indicate that the removal operations performed by ERRS along the western property boundary and on the Bailey Terrace Apartments' property have removed the bulk of PCB-contaminated soil and concrete from these areas. Concentrations of PCBs in samples from these areas were below the targeted cleanup criteria of 16 mg/kg. Despite the favorable results, additional samples may be required along the southwestern portion of the property boundary to better characterize the entirety of the excavated area. Additional confirmation sampling in the gap between sampling locations WSE-1-08-54 and WSE-1-08-55 would help reinforce this conclusion.

Analytical results for the soil samples collected north of the West Pad indicate that the removal operations performed to date have not completely reduced the concentrations of PCBs below the targeted cleanup criteria of 16 mg/kg. Aroclor 1248 concentrations ranged from 110 mg/kg to 8,500 mg/kg at the bottom of the excavation along the northern edge of the West Pad, despite the removal of soil up to 3.5 feet bgs. It is not clear whether the PCB contamination detected in these confirmation samples is entirely *in-situ* contamination, or the result of mechanical cross-contamination from the excavation equipment. The large quantities of crushed concrete, fine particles of soil, and dust at the Site are additional potential sources of windblown and stormwater-related cross-contamination in the open excavation. The excavation remained open from the time the removal operations were completed on December 11, 2007, until the confirmation sampling event on January 8, 2008.



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This letter report is intended to provide documentation of the removal operations performed at the Site to date. Additional removal actions are anticipated at the Site, based on the sampling results and the known concentrations of PCBs in concrete and soil that remain at the Site. These follow-up removal actions will be summarized in the final removal action report and deliverables. If there are any questions or comments regarding this report, please do not hesitate to contact WESTON START at 440-202-2806.

Very truly yours,

Weston Solutions, Inc.

A handwritten signature in black ink, appearing to read "Frank L. Beodray".

Frank Beodray  
WESTON START Project Manager

Attachments:

- A – Figures
- B – Photo Log
- C – Data Tables

cc: Gail Stanuch, U.S. EPA Project Officer  
WESTON START DCN File

## **Attachment A**

- Figure A-1     Soil and Concrete Aroclor 1248 Sampling Results and Maximum Concentration Contour Map
- Figure A-2     Areas Excavated Between December 3 and December 11, 2007
- Figure A-3     Trinity Interim Removal Confirmation Soil Sampling Locations and Analytical Results



Imagery Source:  
GlobeXplorer/Airphoto USA  
2005-09-01

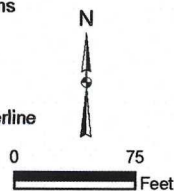
File: D:\Trinity SA GIS\A1248\Interim Removal\F1 A1248 Contours Results HW.mxd 25-Feb-08 09:24 v01.dwg

# Legend

- ▲ Phase I Concrete Sampling Locations
- Phase I Soil Sampling Locations
- Phase II Soil Sampling Locations
- ⊕ Phase II Soil/Concrete Sampling Locations
- Phase III Soil Sampling Locations
- Hw Sampling Locations

## A1248 Max Detect Contours

- 16 mg/kg
- 50 mg/kg
- Gravel Driveway Centerline
- Property Boundary
- Pad Boundaries



**NOTES:**  
Result Units = mg/kg  
mg/kg = milligram per kilogram  
HzW = HzW Environmental  
[0-2] = Sample Depth, in inches  
A1248 = Aroclor 1248

Prepared For:  
**U.S. EPA REGION V**  
Contract No.: EP-S5-06-04  
TDD: 0711-014  
DCN: 337-2A-ABOD

**WESTON SOLUTIONS** Prepared By:  
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**Figure A-1**  
Soil and Concrete Aroclor 1248 Sampling Results  
and Maximum Concentration Contour Removal Map  
Trinity Interim Removal Report  
9203 Detroit Road, Cleveland, Ohio



Imagery Source:  
GlobeXplorer/Airphoto USA  
2005-09-01



**Legend**

-  Gravel Driveway Centerline
  -  Pad Boundaries
  -  Property Boundary
  -  Excavated Areas
- 0 75 Feet
- N

**NOTES:**



Prepared For:  
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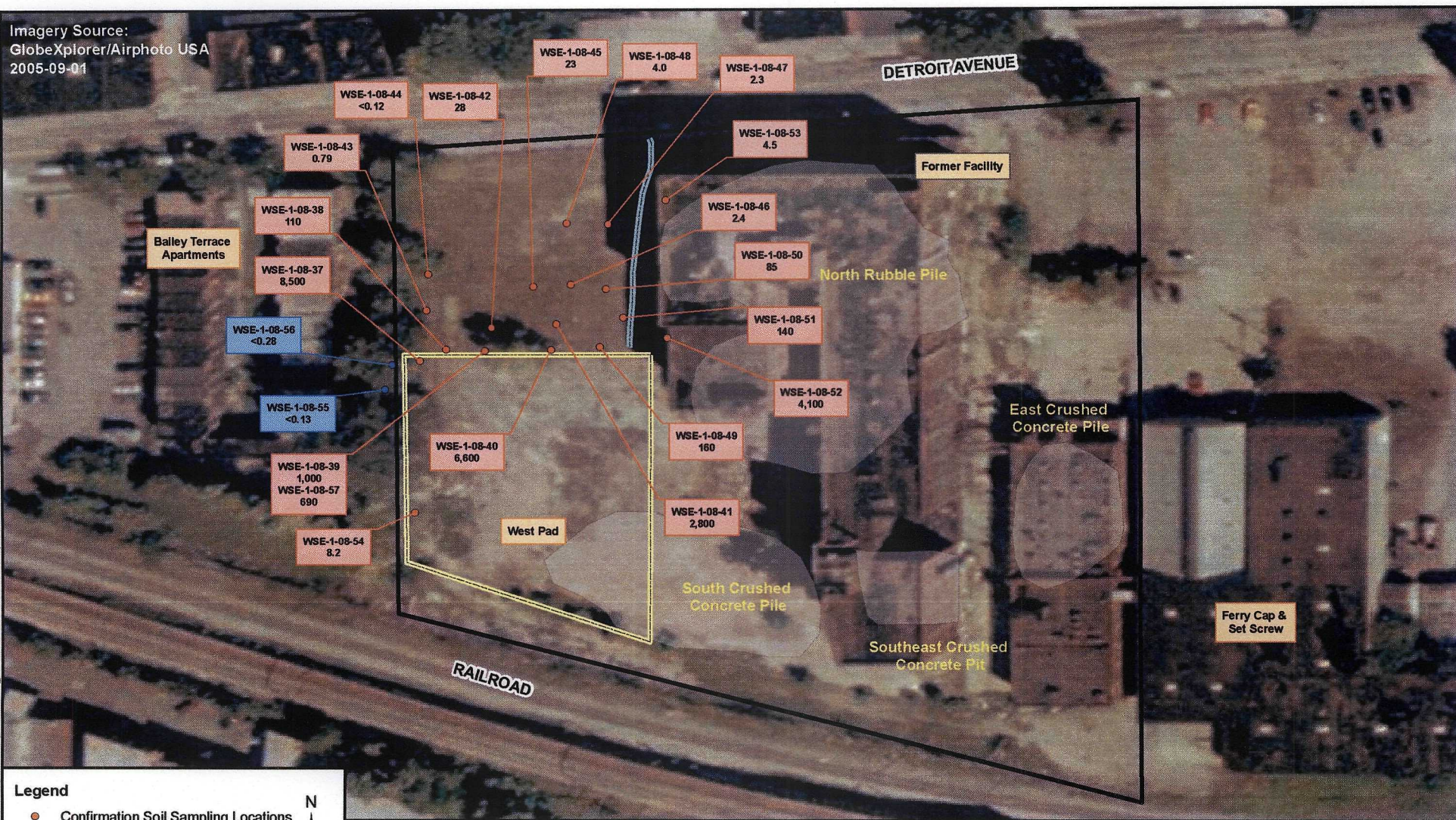


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**Figure A-2**  
Areas Excavated Between December 3  
and December 11, 2007  
Trinity Interim Removal  
9203 Detroit Avenue  
Cleveland, Cuyahoga County, Ohio



Imagery Source:  
GlobeXplorer/Airphoto USA  
2005-09-01



**Legend**

- Confirmation Soil Sampling Locations
  - Residential Soil Sampling Locations
  - Gravel Driveway Centerline
  - Property Boundary
  - Pad Boundaries
- 0 75 Feet

**NOTES:**

All samples 0 to 2 inches bgs  
Only Aroclor 1248 results are listed  
All results are in mg/kg  
mg/kg = milligrams per kilogram



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Figure A-3

Trinity Interim Removal Confirmation Soil Sampling  
Locations and Analytical Results  
Trinity Interim Removal  
9203 Detroit Avenue  
Cleveland, Cuyahoga County, Ohio



## **Attachment B**

### Photo Log



**Site:** Trinity Site Removal Action

**Photo Number:** 1

**Direction:** Northeast

**Subject:** The northwest gravel driveway, removal of the surface six to eight inches of crushed concrete in progress

**Date:** December 3, 2007

**Photographer:** Frank Beodray



**Site:** Trinity Site Removal Action

**Photo Number:** 2

**Direction:** Northwest

**Subject:** The northwest gravel driveway, replacement crushed gravel backfill in place

**Date:** December 4, 2007

**Photographer:** Frank Beodray





**Site:** Trinity Site Removal Action

**Photo Number:** 3

**Direction:** Northeast

**Subject:** Area north of the West Pad prior to the removal of surface soil

**Date:** December 4, 2007

**Photographer:** Frank Beodray



**Site:** Trinity Site Removal Action

**Photo Number:** 4

**Direction:** West

**Subject:** White spray paint delineating the excavation area north of West Pad

**Date:** December 4, 2007

**Photographer:** Frank Beodray





**Site:** Trinity Site Removal Action

**Photo Number:** 5

**Direction:** Southwest

**Subject:** Western property boundary prior to concrete and soil removal

**Date:** December 4, 2007

**Photographer:** Frank Beodray



**Site:** Trinity Site Removal Action

**Photo Number:** 6

**Direction:** West

**Subject:** Area north of the West Pad, removal of surface soil in progress

**Date:** December 5, 2007

**Photographer:** Frank Beodray





**Site:** Trinity Site Removal Action

**Photo Number:** 7

**Direction:** South

**Subject:** Cross-section of the West Pad concrete slab with pink-violet staining

**Date:** December 5, 2007

**Photographer:** Frank Beodray



**Site:** Trinity Site Removal Action

**Photo Number:** 8

**Direction:** Southwest

**Subject:** Cross-section of the West Pad concrete slab with pink-violet staining

**Date:** December 5, 2007

**Photographer:** Frank Beodray





**Site:** Trinity Site Removal Action

**Photo Number:** 9

**Direction:** Southwest

**Subject:** Concrete temporarily staged on the West Pad and later removed from the Site

**Date:** December 5, 2007

**Photographer:** Frank Beodray



**Site:** Trinity Site Removal Action

**Photo Number:** 10

**Direction:** West

**Subject:** Area north of the West Pad after removal

**Date:** December 7, 2007

**Photographer:** Andrew Ravis





**Site:** Trinity Site Removal Action

**Photo Number:** 11

**Direction:** South

**Subject:** Western property boundary, removal of concrete and soil in progress

**Date:** December 11, 2007

**Photographer:** Andrew Ravis



**Site:** Trinity Site Removal Action

**Photo Number:** 12

**Direction:** North

**Subject:** Contractors backfilling the excavation along the western property line with fresh soil and gravel

**Date:** December 11, 2007

**Photographer:** Andrew Ravis





**Site:** Trinity Site Removal Action

**Photo Number:** 13

**Direction:** North

**Subject:** Contractors backfilling the excavation along the western property line with fresh soil and gravel

**Date:** December 11, 2007

**Photographer:** Andrew Ravis



**Site:** Trinity Site Removal Action

**Photo Number:** 14

**Direction:** North

**Subject:** Contractors decontamination a truck prior to departure from the Site using steam cleaning equipment

**Date:** December 11, 2007

**Photographer:** Andrew Ravis

**Attachment C**

Table C-1	Disposition of Wastes
Table C-2	Confirmation Sampling Analytical Results

**Table C-1: Disposition of Wastes**  
**Interim Removal Report for the Trinity Site Removal Action**  
**February 25, 2008**

Waste Stream	Quantity (Tons)	Disposal Facility
Soil and concrete, > 50 ppm PCB	916.30	Wayne Disposal, Inc. Belleville, Michigan
Soil and concrete, < 50 ppm PCB	75.97	Republic Services, Inc. East Sparta, Ohio

Notes:

> – greater than

ppm – parts per million

PCB – polychlorinated biphenyl



**Table C-2: Confirmation Sampling Analytical Results**  
**Interim Removal Report for the Trinity Site Removal Action**  
**Sample Collection Date: January 8, 2008**

Sample ID: WSE-1-08-37			Sample ID: WSE-1-08-38			Sample ID: WSE-1-08-39			Sample ID: WSE-1-08-40		
Aroclor	Result (mg/kg)	Reporting Limit*	Aroclor	Result (mg/kg)	Reporting Limit*	Aroclor	Result (mg/kg)	Reporting Limit*	Aroclor	Result (mg/kg)	Reporting Limit*
1016	ND	1,300	1016	ND	12	1016	ND	120	1016	ND	1,300
1221	ND	1,300	1221	ND	12	1221	ND	120	1221	ND	1,300
1232	ND	1,300	1232	ND	12	1232	ND	120	1232	ND	1,300
1242	ND	1,300	1242	ND	12	1242	ND	120	1242	ND	1,300
1248	8,500	1,300	1248	110	12	1248	1,000	120	1248	6,600	1,300
1254	ND	1,300	1254	ND	12	1254	ND	120	1254	ND	1,300
1260	ND	1,300	1260	ND	12	1260	ND	120	1260	ND	1,300
1268	ND	1,300	1268	ND	12	1268	ND	120	1268	ND	1,300

Sample ID: WSE-1-08-41			Sample ID: WSE-1-08-42			Sample ID: WSE-1-08-43			Sample ID: WSE-1-08-44		
Aroclor	Result (mg/kg)	Reporting Limit*	Aroclor	Result (mg/kg)	Reporting Limit*	Aroclor	Result (mg/kg)	Reporting Limit*	Aroclor	Result (mg/kg)	Reporting Limit*
1016	ND	1,200	1016	ND	1.2	1016	ND	0.24	1016	ND	0.12
1221	ND	1,200	1221	ND	1.2	1221	ND	0.24	1221	ND	0.12
1232	ND	1,200	1232	ND	1.2	1232	ND	0.24	1232	ND	0.12
1242	ND	1,200	1242	ND	1.2	1242	ND	0.24	1242	ND	0.12
1248	2,800	1,200	1248	28	1.2	1248	0.79	0.24	1248	ND	0.12
1254	ND	1,200	1254	ND	1.2	1254	ND	0.24	1254	ND	0.12
1260	ND	1,200	1260	ND	1.2	1260	ND	0.24	1260	ND	0.12
1268	ND	1,200	1268	ND	1.2	1268	ND	0.24	1268	ND	0.12

**Table C-2: Confirmation Sampling Analytical Results**  
**Interim Removal Report for the Trinity Site Removal Action**  
**Sample Collection Date: January 8, 2008**

Sample ID: WSE-1-08-45			Sample ID: WSE-1-08-46			Sample ID: WSE-1-08-47			Sample ID: WSE-1-08-48		
Aroclor	Result (mg/kg)	Reporting Limit*	Aroclor	Result (mg/kg)	Reporting Limit*	Aroclor	Result (mg/kg)	Reporting Limit*	Aroclor	Result (mg/kg)	Reporting Limit*
1016	ND	1.3	1016	ND	0.13	1016	ND	0.13	1016	ND	0.12
1221	ND	1.3	1221	ND	0.13	1221	ND	0.13	1221	ND	0.12
1232	ND	1.3	1232	ND	0.13	1232	ND	0.13	1232	ND	0.12
1242	ND	1.3	1242	ND	0.13	1242	ND	0.13	1242	ND	0.12
1248	23	1.3	1248	2.4	0.13	1248	2.3	0.13	1248	4.0	0.12
1254	ND	1.3	1254	ND	0.13	1254	ND	0.13	1254	ND	0.12
1260	ND	1.3	1260	ND	0.13	1260	ND	0.13	1260	ND	0.12
1268	ND	1.3	1268	ND	0.13	1268	ND	0.13	1268	ND	0.12

Sample ID: WSE-1-08-49			Sample ID: WSE-1-08-50			Sample ID: WSE-1-08-51			Sample ID: WSE-1-08-52		
Aroclor	Result (mg/kg)	Reporting Limit*	Aroclor	Result (mg/kg)	Reporting Limit*	Aroclor	Result (mg/kg)	Reporting Limit*	Aroclor	Result (mg/kg)	Reporting Limit*
1016	ND	12	1016	ND	13	1016	ND	13	1016	ND	120
1221	ND	12	1221	ND	13	1221	ND	13	1221	ND	12
1232	ND	12	1232	ND	13	1232	ND	13	1232	ND	120
1242	ND	12	1242	ND	13	1242	ND	13	1242	ND	120
1248	160	12	1248	85	13	1248	140	13	1248	4,100	120
1254	ND	12	1254	ND	13	1254	ND	13	1254	ND	120
1260	ND	12	1260	ND	13	1260	ND	13	1260	ND	120
1268	ND	12	1268	ND	13	1268	ND	13	1268	ND	120



**Table C-2: Confirmation Sampling Analytical Results**  
**Interim Removal Report for the Trinity Site Removal Action**  
**Sample Collection Date: January 8, 2008**

Sample ID: WSE-1-08-53			Sample ID: WSE-1-08-54			Sample ID: WSEBA-1-08-55 <sup>†</sup>			Sample ID: WSEBA-1-08-56 <sup>†</sup>		
Aroclor	Result (mg/kg)	Reporting Limit*	Aroclor	Result (mg/kg)	Reporting Limit*	Aroclor	Result (mg/kg)	Reporting Limit*	Aroclor	Result (mg/kg)	Reporting Limit*
1016	ND	1.2	1016	ND	1.3	1016	ND	0.13	1016	ND	0.28
1221	ND	1.2	1221	ND	1.3	1221	ND	0.13	1221	ND	0.28
1232	ND	1.2	1232	ND	1.3	1232	ND	0.13	1232	ND	0.28
1242	ND	1.2	1242	ND	1.3	1242	ND	0.13	1242	ND	0.28
1248	4.5	1.2	1248	8.2	1.3	1248	ND	0.13	1248	ND	0.28
1254	ND	1.2	1254	ND	1.3	1254	ND	0.13	1254	ND	0.28
1260	ND	1.2	1260	ND	1.3	1260	ND	0.13	1260	ND	0.28
1268	ND	1.2	1268	ND	1.3	1268	ND	0.13	1268	ND	0.28

Sample ID: WSE-1-08-57 <sup>‡</sup>		
Aroclor	Result (mg/kg)	Reporting Limit*
1016	ND	12
1221	ND	12
1232	ND	12
1242	ND	12
1248	<b>690</b>	12
1254	ND	12
1260	ND	12
1268	ND	12

\* – Minimum reporting limit, in mg/kg

† – Collected on Bailey Terrace Apartments property

‡ – Duplicate of sample WSE-1-08-39

**Detection greater than 16 mg/kg (Ohio EPA VAP Generic Direct-Contact Soil Standard for industrial and commercial property)**

mg/kg – milligrams per kilogram

ND – non-detect